

135165

WHITMOYER LABORATORIES
ENFORCEMENT REMOVAL ADMINISTRATIVE RECORD FILE
INDEX OF DOCUMENTS

I. ENFORCEMENT DOCUMENTS

1. Deed between Tuscarora Pipe Line Company, Limited, and the Buckeye Pipe Line Company, 12/30/60. P. 100001-10002A.
2. Agreement made between Rohm & Haas Company, Whitmoyer Laboratories, Inc., and Mr. Clarence W. Whitmoyer, Mr. Thomas W. Balkcom and Mr. Michael J. Demucchio, 4/17/64. P. 100003-100024.
3. Letter to Dr. Robert J. Myers, Rohm & Haas Company, from G. W. Whitmoyer, Whitmoyer Laboratories, Inc., re: Arsenical acid being produced as by-product, 6/10/64. P. 100025-100027.
4. Escrow Agreement among Rohm & Haas Company, Whitmoyer Laboratories, Inc., the Philadelphia National Bank, and Mr. Clarence W. Whitmoyer, Mr. Thomas W. Balkcom, and Mr. Michael J. Demucchio, 6/30/64. P. 100028-100036.
5. Letter to Hon. John L. Harvey, Department of Health, Education and Welfare, from J. Fay Hall, Jr., Rohm & Haas Company, re: Completion of acquisition of Whitmoyer Laboratories, 7/1/64. P. 100037-100037.
6. Amended Certificate of Authority, re: Changing name of W-L Inc. to Whitmoyer Laboratories, Inc., 7/2/64. P. 100038-100042.
7. Memorandum to Mr. C.W. Whitmoyer, Whitmoyer Laboratories, Inc., from D.J. Butterbaugh, Rohm & Haas Company, re: Waste disposal, 9/16/64. P. 100043-100043.
8. Assignment of Rights of Way from the Buckeye Pipe Line Company, Ohio, to Buckeye Pipe Line Company, Pennsylvania, 9/18/64. P. 100044-100047.
9. Indenture between Buckeye Pipe Line Company, Ohio and Buckeye Pipe Line Company, Pennsylvania, 9/28/64. P. 100048-100050.
10. Indenture between Buckeye Pipe Line Company and Whitmoyer Laboratories, Inc., 12/14/64. P. 100051-100053.

* Administrative Record File available 6/28/91.

11. Memorandum to Dr. D.J. Butterbaugh, Rohm & Haas Company, from Mr. Robert P. Goodale, Rohm & Haas Company, re: Handling of news contacts on Whitmoyer water contamination, 1/5/65. P. 100054-100054.
12. Memorandum to Messrs. Haas, Covert, Klein, Butterbaugh, Frederick, Hall, Goodale, Iezzi, and Marston, Rohm & Haas Company, from F.J. Rarig, Rohm & Haas Company, re: No public statements about presence of arsenical compounds, 1/6/65. P. 100055-100055.
13. Memorandum to Rohm & Haas Company, from Mr. T. Iezzi, Rohm & Haas Company, re: Activities of cleaning up waste problem, 2/15/65. P. 100056-100057.
14. Memorandum to Mr. C.W. Whitmoyer, Whitmoyer Laboratories, Inc., from C.L. Levesque, Rohm & Haas Company, re: Transmittal of Laboratory 28's write-up of the projected semi-works trials, 10/1/65. P. 100058-100070. The write-up is attached.
15. Letter to Mr. Furman Rhinehart, Fish, Richardson & Neave, from Mr. Everett H. Murray Jr., Rohm & Haas Company, re: Centralization of all Whitmoyer patent activity, 3/10/66. P. 100071-100071.
16. Memorandum to G.A. Trout, Whitmoyer Laboratories, Inc., from J.F. Abernathy, Rohm & Haas Company, re: Disposal of 143 drums of waste at sea, 4/1/66. P. 100072-100072.
17. Memorandum to Mr. G. Trout, Whitmoyer Laboratories, Inc., from D.J. Butterbaugh, Rohm & Haas Company, re: Transmittal of two memoranda and a report, 4/25/66. P. 100073-100081. The memoranda and report are attached.
18. Report: Summary of Drilling Project for Additional Recovery Wells, Whitmoyer Laboratories, Myerstown, Pennsylvania, prepared by Leggette, Brashears & Graham, 1/67. P. 100082-100114.
19. Minutes of a meeting of the Board of Directors of Whitmoyer Laboratories, Inc., 5/2/67. P. 100115-100133.
20. Report: Expansion of Well Water Treatment Operation at Whitmoyer Laboratories, prepared by R.L. DeWitt, Rohm & Haas Company, 5/17/68. P. 100134-100137.

21. General Release by Rohm & Haas Company and Whitmoyer Laboratories, Inc., of Mr. Clarence W. Whitmoyer, Sr., Mr. Thomas W. Balkcom, Mr. Michael J. Demucchio and C.W. Corporation of Myerstown as stockholders, 2/26/69. P. 100138-100138.
22. Memorandum to Mr. W.P. Ambrogi, Whitmoyer, from Mr. Louis Klein, Rohm & Haas Company, re: Returning to former treatment of water, 4/23/69. P. 100139-100139.
23. Letter to Mr. John P. Durr, PA Department of Health, from Mr. T. Iezzi, Rohm & Haas Company, re: Response to Sanitary Water Board letter of February 29, 1969, 6/2/69. P. 100140-100141.
24. Letter to Mr. T. Iezzi, Rohm & Haas Company, from Mr. Jack B. Graham, Leggette, Brashears & Graham, re: General description of geologic setting of Tulpehocken Creek watershed and comments on ground water movement, 6/18/68. P. 100142-100145.
25. Letter to Mr. Herbert A. Howlett, Delaware River Basin Commission, from Mr. T. Iezzi, Rohm & Haas Company, re: Response to several questions put forth by the Delaware River Basin Commission, 6/25/68. P. 100146-100160. Attachments 1-5, cited in the letter, are attached.
26. Memorandum to Mr. W.P. Ambrogi, from S.S. Paist, Rohm & Haas Company, re: Confirmation of telephone conversation and response to September 21, 1970 memo, 9/23/70. P. 100161-100162. A letter is attached.
27. Letter to Mr. Francis T. Brezenski, U.S. Department of the Interior, from Mr. T. Iezzi, Rohm & Haas Company, re: Confirmation of December 1st meeting, 11/20/70. P. 100163-100167. A letter and a memorandum are attached.
28. Memorandum to Mr. D.W. Kenny, Rohm & Haas Company, from Mr. Robert P. Goodale, Rohm & Haas Company, re: Summarization of media coverage with a number of representatives of the news media, 3/12/71. P. 100168-100170.
29. Memorandum to Mr. D.W. Kenny, from Mr. Robert P. Goodale, Rohm & Haas Company, re: Predicament about possible loss of creditability due to incomplete disclosure of information, 3/16/71. P. 100171-100172.
30. Letter to Mr. Gus J. Bennett, U.S. EPA, from Mr. D.W. Kenny, Rohm & Haas Company, re: Transmittal of various reports, 3/22/71. P. 100173-100174.

31. Memorandum to Mr. D.W. Kenny, from Mr. Robert P. Goodale, Rohm & Haas Company, re: Preparation of position paper for the news media, 3/23/71. P. 100175-100175.
32. Memorandum of Facts, re: Ocean Disposal of Arsenical Industrial Waste Products Generated at Whitmoyer Laboratories, Inc., prepared by Rohm & Haas Company, 3/23/71. P. 100176-100190.
33. Letter to Mr. Benjamin Lim, U.S. EPA, from D.W. Kenny, Rohm & Haas Company, re: Transmittal of documents bound in a notebook regarding disposal at sea of industrial wastes containing arsenic residues, 3/24/71. P. 100191-100192.
34. Letter to Mr. Walter A. Lyon, PA Department of Health, from Mr. F.J. Rarig, Rohm & Haas Company, re: Response to assessment of arsenic contamination, 7/19/71. P. 100193-100197. A page of sampling data, a map and a monthly well concentration chart are attached.
35. Memorandum to Mr. W.P. Ambrogio and Dr. J.W. Nemec, from S.S. Paist, Rohm & Haas Company, re: Preparations for meeting with EPA, 4/27/72. P. 100198-100199.
36. Memorandum to Mr. Hall, et al., Rohm & Haas Company, from S.S. Paist, Rohm & Haas Company, re: Meeting with EPA regarding the disposal of Whitmoyer arsenic wastes, 5/17/72. P. 100200-100213.
37. Letter to Mr. William C. Bucciarelli, PA Department of Environmental Resources (PADER), from D.G. Clarke, Rohm & Haas Company, re: Confirmation of October 20, 1972 meeting, 10/9/72. P. 100214-100214.
38. Memorandum to Mr. C.J. Prizer, Rohm & Haas Company, from S.S. Paist, Rohm & Haas Company, re: Arranging and preparing a meeting with State officials, 5/8/73. P. 100215-100215.
39. Report: Ocean Dumping of Arsenic Solution, prepared by Stanley S. Paist, Rohm & Haas Company, 6/20/73. P. 100216-100234.
40. Letter to Mr. Stanley S. Paist, Rohm & Haas Company, from Mr. Charles W. Sandman Jr., House of Representatives, re: Response to letter, 7/2/73. P. 100235-100235.

41. Letter to Mr. Neal Moerschel, c/o Honorable William Roth, from D.G. Clarke, Rohm & Haas Company, re: Chronology of interactions with EPA, 7/2/73. P. 100236-100238.
42. Memorandum to Dr. Winters, et al., from S.S. Paist, Rohm & Haas Company, re: Review of January 7th meeting, 1/14/74. P. 100239-100239.
43. Memorandum to Mr. H.M. Huffman, Whitmoyer Laboratories, Inc., from D.G. Clarke, Rohm & Haas Company, re: Ocean dumping permit, 9/10/74. P. 100240-100240.
44. Letter to Mr. Richard T. Dewling, U.S. EPA, from D.G. Clarke, Rohm & Haas Company, re: Proposal by Chem-trol for an alternative to ocean disposal, 12/11/74. P. 100241-100243. A second letter is attached.
45. Letter to Mr. James V. Donato, PADER, from Mr. Duane G. Clarke, Rohm & Haas Company, re: Confirmation of January 14, 1974 telephone conversation and summarization of points made in a letter, 1/15/76. P. 100244-100249. A Water Pollution Control report is attached.
46. Letter to Mr. Herbert Howlett, Delaware River Basin Commission, from Mr. Duane G. Clarke, Rohm & Haas Company, re: Transmittal of analytical record on samples from the Tulpehocken Creek, 1/22/76. P. 100250-100252. A page of sampling data and an Appropriation Request are attached.
47. Letter to Mr. William Thompson from Mr. Frantz A. Dengler, Whitmoyer Laboratories, Inc., re: Resumption of arsenic acid manufacturing, 2/28/77. P. 100253-100253.
48. Appropriation Request form, Rohm & Haas Company, 2/16/77. P. 100254-100254.
49. Memorandum to Mr. J. Gallagher, Whitmoyer Laboratories, Inc., from R.P. Baker, Rohm & Haas Company, re: Transmittal of operating instructions for arsenilic acid project cooling tower system, 8/2/77. P. 100255-100263. The instructions are attached.
50. Water Samples Analytical Reports, Whitmoyer Laboratories, Inc., 1/20/77-1/4/78. P. 100264-100288.

51. Memorandum to F.A. Dengler, Whitmoyer Laboratories, Inc., from L. J. Croesus, Whitmoyer Laboratories, Inc., re: Drinking water standards for arsenic, 2/14/78. P. 100289-100290. A page from the Federal Register is attached.
52. Memorandum to Mr. J.I. Schmitt from D.J. King, re: Whitmoyer supplying bottled water to residents with a contaminated water supply, 2/23/78. P. 100291-100292. A list of the residents provided with bottled water is attached.
53. Letter to Mr. Donald J. King, Whitmoyer Laboratories, Inc., from Mr. James I. Schmitt, Rohm & Haas Company, re: Processing and disposal of waste solution from the Paulsboro tank, 6/7/78. P. 100293-100293.
54. Inter-office memorandum to Dr. Tony Bott, Mr. Leroy Kauffman, and Mr. Paul Sells, Beecham Laboratories, from Mr. Ernest W. Cornett, Beecham Laboratories, re: Tradestyle (logo) for Whitmoyer, 6/13/78. P. 100294-100294.
55. Memorandum to Mr. D.J. King from A.R. Bott, re: Relocation money, 7/31/78. P. 100295-100295.
56. Memorandum to Mr. H.M. Huffman, Whitmoyer Laboratories, Inc., from Mr. L.J. Croesus, re: Assessment of the health effects of arsenic, 6/26/78. P. 100296-100297. One page of a report is attached.
57. Letter to Mr. Donald J. King, Whitmoyer Laboratories, Inc., from Mr. Hartwin E. Weiss, PADER, re: Terms of agreement between Whitmoyer Laboratories, Inc. and PADER, 10/3/78. P. 100298-100301. A Transmittal of Penalty Payment and a letter are attached.
58. Memorandum to Mr. H.M. Huffman, from Mr. R.S. Rosera, Whitmoyer Laboratories, Inc., re: Newco proposal for arsenical waste disposal, 10/26/78. P. 100302-100302.
59. Letter to Mr. Narendra N. Desai, PADER, from Mr. Lloyd J. Croesus, Whitmoyer Laboratories, Inc., re: Transmittal of amended application to modify waste evaporation system, 11/17/78. P. 100303-100338. The application with supporting documents is attached.
60. Letter to Mr. Narendra N. Desai, PADER, from Mr. Lloyd J. Croesus, Whitmoyer Laboratories, Inc., re: Transmittal of monthly summary report of emissions, 11/22/78. P. 100339-100340. The summary report is attached.

61. Memorandum to R.S. Rosera, from H.M. Huffman, Whitmoyer Laboratories, Inc., re: Discussion about aniline emissions in excess of the limit, 12/4/78. P. 100341-100343. Two monthly summary reports are attached.
62. Waste Product Record, Newco Chemical Waste Systems Inc., 8/3/78. P. 100344-100344.
63. Letter to Dr. Dennis Clark, Beecham Laboratories, from Mr. Gregory P. Hoover, Whitmoyer Laboratories, Inc., re: Transmittal of sampling data, 1/8/79. P. 100345-100346. A table is attached.
64. Inter-office memorandum to Dr. D.E. Clark, Beecham Laboratories, from Mr. R.C. Blyth, Beecham Laboratories, re: Arsenical acid characterization, 1/25/79. P. 100347-100347.
65. Memorandum to Mr. D.J. King, from Mr. F.A. Dengler, Whitmoyer Laboratories, Inc., re: Status of private wells, 2/8/78. P. 100348-100350. A page of a Water Sample Analytical Report and a topographic and geologic survey are attached.
66. Memorandum to T.E. Long, Whitmoyer Laboratories, Inc., from L.J. Croesus, Whitmoyer Laboratories, Inc., re: Concern of Beecham about arsenical storage vault, 3/12/79. P. 100351-100354. A sheet of monitoring data and a map are attached.
67. Report: Research Notebook No. W-241, prepared by Rohm & Haas Company, 3/12/79. P. 100355-100454.
68. Invoice of SCA Chemical Waste Services, Inc. to Whitmoyer Labs, Inc., 3/29/79. P. 100455-100455.
69. Memorandum to Mr. L.J. Croesus, Whitmoyer Laboratories, Inc., from Mr. T.E. Long, Whitmoyer Laboratories Inc., re: Sludge removal from the department 8101 waste system, 5/1/79. P. 100456-100457. Another memorandum is attached.
70. Letter to Mr. Michael T. Scornavacchi, Stabatrol Corporation, from Mr. Richard S. Rosera, Whitmoyer Laboratories, Inc., re: A reduction in drum price, 6/16/80. P. 100458-100458.
71. Injury Report for Mr. Randall L. Lutz, Beecham Inc., 8/9/79. P. 100459-100461.

72. Purchase Order #18987, from Whitmoyer Laboratories, Inc., re: One year contract for disposal of arsenic wastes, 9/13/79. P. 100462-100462.
73. Letter to Mr. J.L. Shaak, Whitmoyer Laboratories, Inc., from Mr. Michael T. Scornavacchi, Stabatrol Corporation, re: Receipt of purchase order, 9/24/79. P. 100463-100463.
74. Sales Analysis, Beecham Pharmaceuticals, 4/8/80. P. 100464-100500.
75. Memorandum to Mr. L.J. Croesus, Whitmoyer Laboratories, Inc., from Mr. T.E. Long, Whitmoyer Laboratories, Inc., re: Arsenic found in process water, 4/16/80. P. 100501-100501.
76. Memorandum to Mr. H.M. Huffman, Whitmoyer Laboratories, Inc., from Mr. L.J. Croesus, Whitmoyer Laboratories, Inc., re: Arsenic contamination of rainwater in dike, 4/21/80. P. 100502-100502.
77. Debit Note to Mr. Rosera, Beecham Laboratories, re: Transfer to equipment, 5/6/80. P. 100503-100504.
78. Memorandum to Mr. P. Fallo and Mr. T. Prinsen, Beecham Inc., from Mr. P. S. Pfeffer, Beecham Inc., re: Transmittal of an executed renewal bond, 8/11/80. P. 100505-100511. A bond transcript and a bond for entry of merchandise is attached.
79. Memorandum to Mr. H.M. Huffman, Whitmoyer Laboratories, Inc., from Mr. R.S. Rosera, Whitmoyer Laboratories, Inc., re: Quote for site clean-up, 9/2/80. P. 100512-100514. A letter on cleanup of an underground Arsenical Dump is attached.
80. Memorandum to Mr. R. Frawley, Whitmoyer Laboratories, Inc., from Mr. P. S. Pfeffer, Whitmoyer Laboratories, Inc., re: Requirement to carry insurance if deemed a generator or transporter, 9/3/80. P. 100515-100515.
81. Memorandum to Mr. R.D. Frawley, Whitmoyer Laboratories, Inc., from Mr. P.S. Pfeffer, Whitmoyer Laboratories, Inc., re: Generator/transporter status for Whitmoyer, 10/13/80. P. 100516-100516.
82. Memorandum to Mr. L.J. Croesus, Whitmoyer Laboratories, Inc., from Mr. R. S. Rosera, Whitmoyer Laboratories, Inc., re: Closure and post closure plans and estimates for RCRA regulations, 2/9/81. P. 100517-100518.

83. Personnel Requisition, Beecham Laboratories, re: Increase production of arsenical acid, 3/11/81. P. 100519-100519.
84. Beecham Pharmaceuticals, Additions to Fixed Assets, 3/31/81. P. 100520-100521.
85. Memorandum to Mr. H.M. Huffman, Whitmoyer Laboratories, Inc., from Mr. Lloyd J. Croesus, Whitmoyer Laboratories, Inc., re: Leaching of arsenic into canal, 5/6/81. P. 100522-100525.
86. Analytical Data, Whitmoyer Laboratories, Inc., 6/16/81. P. 100526-100526.
87. Summary of all plant spills, 6/12/81-6/18/81. P. 100527-100527.
88. Memorandum to N. Yiengst, Beecham Inc., from J. Urban, Beecham Inc., re: Fixed asset additions, 9/15/81. P. 100528-100529.
89. Letter to Mr. Harold Huffman, Whitmoyer Laboratories, Inc., from Mr. William C. Quinn, Beecham Laboratories, re: Information on a fluid bed dryer, 12/9/81. P. 100530-100531.
90. Letter to Mr. Gary R. Galida, Whitmoyer Laboratories, Inc., from Mr. Lloyd J. Croesus, Whitmoyer Laboratories, Inc., re: Transmittal of information for a Hazardous Waste Transporter License Application, 1/28/82. P. 100532-100538. The following are attached:
- a) a completed collateral bond form;
 - b) a letter of credit;
 - c) a certificate of insurance.
91. Memorandum to Mr. W.H. Whalen, Whitmoyer Laboratories, Inc., from Mr. L.J. Croesus, Whitmoyer Laboratories, Inc., re: EPA quality criteria for water, 2/19/82. P. 100539-100551. Two articles are attached.
92. Package of state income tax returns, Beecham Inc., 4/1/81-3/31/82. P. 100552-100559.
93. Handwritten letter to Don, from Lloyd, re: Rate of waste through the system, 3/15/82. P. 100600-100600.

94. Letter to the Management of Whitmoyer Laboratories, Inc., from Mr. A.J. White, Whitmoyer Laboratories, Inc., re: Notes from a Board of Directors meeting on accounts receivable problems, 5/13/82. P. 100601-100601.
95. Inventory Control Waste Reports for Carbon and Charcoal, 5/26/82. P. 100602-100628.
96. Myerstown Borough Waste Permits, 1/1/78-5/15/82. P. 100629-100693.
97. Confidential Sampling Reports, Residential Wells, 10/7/65-3/1/82. P. 100694-100712.
98. Tulpehocken Creek Monitoring for Arsenical Storage Vault, 12/11/78-9/8/82. P. 100713-100714.
99. Reports on total arsenic in plant wells, 1/29/78-6/30/83. P. 100715-100718.
100. Handwritten notes, re: Raw materials purchases, 9/28/83. P. 100719-100719.
101. Letter to Mrs. Kathy Innamorato, Beecham Inc., from Mr. H.H. Hibshman, Jr., Whitmoyer Laboratories, Inc., re: Schedule of building depreciation, 1/11/84. P. 100720-100722.
102. Account Analyses, American Bank, 11/82-3/20/84. P. 100723-100735.
103. Summary of payments and financial history of Beecham Inc., 12/20/84. P. 100736-100746.
104. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. James M. Seif, U.S. EPA, re: Justification for approval of a removal action, 12/17/87. P. 100747-100760. A funding request, a letter and five pages of data are attached.
105. Letter to Ms. Diane Ajl, U.S. EPA, from Ms. Ellen S. Friedell, Rohm & Haas Company, re: Innocent purchaser defense, 4/20/88. P. 100761-100764.
106. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. James M. Seif, U.S. EPA, re: Justification for additional funding request, 9/21/88. P. 100765-100772. A request for a ceiling increase and change of scope of work is attached.

107. Memorandum to EES Attorneys, U.S. EPA, from Ms. Nancy Firestone, U.S. EPA, re: Transmittal of a brief regarding Parent Corporation, 2/15/89. P. 100773-100834.
108. Report: Final Concentrated Liquids Assessment Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by EBASCO Services Inc., 3/24/89. P. 100835-100956.
109. Report: Final Remedial Investigation Report - Volume 1A - Text, Whitmoyer Labs Site, Lebanon County, Pennsylvania, 11/89. P. 100957-101299.
110. Report: Final Remedial Investigation Report - Volume 1B - Text, Whitmoyer Labs Site, Lebanon County, Pennsylvania, 11/89. P. 101300-101486.
111. Report: Final Remedial Investigation Report - Volume III of V - Appendices A-J, Whitmoyer Labs Site, Lebanon County, Pennsylvania, prepared by EBASCO Services Inc., 11/89. P. 101487-102225.
112. Report: Final Remedial Investigation Report - Volume IV of V - Appendix K, Whitmoyer Labs Site, Lebanon County, Pennsylvania, prepared by EBASCO Services Inc., 11/89. P. 102226-103049.
113. Report: Final Remedial Investigation Report - Volume V of V - Appendix L-S, Whitmoyer Labs Site, Lebanon County, Pennsylvania, prepared by EBASCO Services Inc., 11/89. P. 103050-103363.
114. Telefax Cover Sheet to Mr. Fred McMillan, U.S. EPA, from Mr. Craig A. Olewiler and Ms. Noreen Chamberlain, PADER, re: Transmittal of EPA forms referring to Whitmoyer Laboratories, Inc., 11/20/89. P. 103364-103383.
115. Summary of payments and financial history of Beecham Inc., 1/22/90. P. 103384-103392.
116. Report: Final Feasibility Study Report - Volume I of IV, Whitmoyer Labs Site, Lebanon, Pennsylvania, prepared by EBASCO Services Inc., 2/90. P. 103393-103626.
117. Report: Final Feasibility Study Report - Volume II of IV, Whitmoyer Labs Site, Lebanon, Pennsylvania, prepared by EBASCO Services Inc., 2/90. P. 103627-103803.

118. Report: Final Feasibility Study Report - Volume III of IV, Appendices A-C, Whitmoyer Labs Site, Lebanon, Pennsylvania, prepared by EBASCO Services Inc., 2/90. P. 103804-104066.
119. Report: Final Feasibility Study Report - Volume IV of IV, Appendices D-H, Whitmoyer Labs Site, Lebanon Pennsylvania, prepared by EBASCO Services Inc., 2/90. P. 104067-104375.
120. Report: U.S. EPA Proposed Plan, Whitmoyer Laboratories, Lebanon County, Pennsylvania, 4/90. P. 104376-104395.
121. Letter to Mr. Anthony T. Dappolone, U.S. EPA, from Ms. Ellen S. Freidel, Rohm & Haas Company, and Ms. Bonnie Allyn Barnett, Drinker, Biddle & Reath, re: Response to request for public comments, 9/14/90. P. 104396-104400.
122. Partial letter to Mr. J. Lawrence Wilson, Rohm & Haas Company, from U.S. EPA, re: Notice of potential liability, 9/20/90. P. 104401-104401.
123. Letter to Mr. Robert Bauman, Smith Kline-Beecham Americas, Inc., from Mr. Thomas C. Voltaggio, U.S. EPA, re: Notice of potential liability, 9/20/90. P. 104402-104405.
124. Memorandum to file, from Ms. Karen M. Wolper, U.S. EPA, re: Record of notice with the state, 9/26/90. P. 104406-104406.
125. Memorandum to file, from Ms. Karen M. Wolper, U.S. EPA, re: Record of consultation with EPA Headquarters, 9/26/90. P. 104407-104407.
126. Letter to Mr. Richard B. Stewart, U.S. Department of Justice, from Mr. Edwin B. Erickson, U.S. EPA, re: Transmittal of original Civil Litigation Report, 9/28/90. P. 104408-104556. The report is attached.
127. Administrative Order by Consent for Removal Action In the Matter of: Whitmoyer Laboratories Site, 9/28/90. P. 104557-104622.
128. Report: Groundwater Protection in Land Disposal of Arsenic-Bearing Wastes, prepared by I. Iezzi, Rohm & Haas, (undated). P. 104623-104639.

129. IRS Depreciation form, Beecham, Inc. and Subsidiaries,
(Whitmoyer Labs, Inc.), (undated). P. 104640-104640.

130. Application for a Certificate of Authority by a Foreign
Business Corporation, (undated). P. 104641-104650.